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April 15, 2015

Carlton Parker
Nevada Division of Environmental Protection
Bureau of Corrective Actions
2030 E. Flamingo Road, Suite 230
Las Vegas, NV 89119

**Re: Quarterly Progress Report - First Quarter 2015
Environmental Conditions Investigation Program
Former Montrose Facility - Henderson, Nevada**

Dear Mr. Parker,

On behalf of Montrose Chemical Corporation of California (Montrose), please find summarized below a list of work performed or significant activities completed for the environmental program at the former Montrose facility in Henderson, Nevada during the First Quarter of 2015. This Quarterly Progress Report has been prepared in accordance with the Montrose Phase II Consent Decree Agreement, dated June 18, 1996.

- On February 12, 2015, Montrose and the Stauffer site Companies submitted to NDEP a response to comments on NDEP's previously issued comments on the Companies' Eastside workshop documents.
- On February 18, 2015, Montrose and the Stauffer site Companies met with NDEP to discuss and resolve NDEP's comments, on the Draft Site Groundwater Remedial Alternate Study (dated December 10, 2014) and plan for the revision and submittal of a revised version.
- Also on February 18, 2015, Montrose, the Stauffer site Companies met with NDEP to update the status of ongoing site activities.

As of the end of the 1st quarter, Montrose and its consultants were working on the following programs or documents:

- Development of a response to comments to NDEP's comments on the DUE for the CPA-FTF area originally submitted October 31, 2014
- A revision of the DCB Warehouse NFA submittal in response to NDEP comments.
- A Data Usability Evaluation (DUE) document for the Former Plant Site (FPS) to accompany a CSM for submittal planned for the second quarter 2015.

- A CSM revision and a response to NDEP comments on the previous submitted Screening Risk Assessment for the Former Benzene Storage Tank Area (FBST) intended for submittal to NDEP in the second quarter 2015.
- A package of information requested by NDEP to process a NFA for the Former Underground Benzene Storage Tank Area (FUBST), intended for submittal to NDEP in May 2015.
- Development of a Data Summary Report for the MC-MW-18 DNAPL mobility test, expected for submittal to NDEP by mid-May 2015.
- Development of a long-term access agreement to assure continued access to Montrose ECI areas on the Olin property.
- Development of a deed restriction agreement with Olin to assist closure of the Montrose site assessment areas by future NDEP NFA determinations.

Although not directly part of the Phase II ECI program, during the 1st quarter of 2015, Montrose continued its participation in the operation and management of the site-wide groundwater treatment system (GWTS). Among the 1st quarter GWTS operations were a submittal on January 27, 2015 of a request for a reduction in frequency of the quarterly GWTS operations report, the submittal of the 4th Quarter 2014 Operations Report (dated February 16, 2015) and the submittal of the Semi-annual Underground Injection Control Report, also dated February 16, 2015.

Should you have any comments on this progress report, do not hesitate to call me.

Submitted by,



Paul V. Sundberg
Consultant to Montrose

Cc:

Joseph Kelly - Montrose - Bainbridge Island - via e-mail

Kelly Richardson - Latham & Watkins - San Diego - via e-mail

BMI Interested Parties via document distribution website